

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY AVERAGE WHOLESAL PRICE LITIGATION)	
)	MDL NO. 1456
)	Civil Action No. 01-12257-PBS
)	Subcategory No. 07-12141-PBS
)	
THIS DOCUMENT RELATES TO:)	
)	
<i>State of Iowa v. Abbott Laboratories, Inc., et al.</i>)	Judge Patti B. Saris
)	
)	

JOINT MOTION TO DISMISS WITH PREJUDICE

TO THE HONORABLE JUDGE:

The State of Iowa (“Plaintiff”) and defendants Watson Pharmaceuticals, Inc. and Watson Pharma, Inc. f/k/a Schein Pharmaceuticals, Inc. (collectively “Watson Parties”), having settled all matters in dispute between them in this cause, jointly move this Court to dismiss with prejudice all of the Plaintiff’s claims asserted herein against the Watson Parties, provided that the dismissal shall not affect the rights and duties of such parties as expressed in their Settlement Agreement.

Dated: September 14, 2011

Respectfully submitted,

By: /s/ Joanne M. Cicala
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On Behalf of Plaintiffs the State of Iowa

By: /s/ James W. Matthews

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*On Behalf of Watson Pharmaceuticals, Inc. and
Watson Pharma, Inc., f/k/a Schein
Pharmaceuticals, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2011, I caused a true and correct copy of the foregoing, JOINT MOTION TO DISMISS WITH PREJUDICE, to be served on counsel of record for each party through the Court's Electronic Case Filing System and via LexisNexis File & Serve.

/s/ James Carroll
KIRBY McINERNEY LLP